

## UNITED STATES DISTRICT COURT

for the

Eastern District of Virginia



\_\_\_\_ Richmond \_\_\_\_ Division

Marsielle Bey ex. Rel Corey Lewis, In Propria  
Persona, Sui Juris

Case No.

3:21 CV 350

(to be filled in by the Clerk's Office)

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint.  
If the names of all the plaintiffs cannot fit in the space above,  
please write "see attached" in the space and attach an additional  
page with the full list of names.)

-v-

ESTHER WIGGINS LYLE, dba Presiding Judge  
(Substitute)  
VANESSA L JONES, dba Chief Judge  
CARL S LEONARD, dba Sheriff

Defendant(s)

(Write the full name of each defendant who is being sued. If the  
names of all the defendants cannot fit in the space above, please  
write "see attached" in the space and attach an additional page  
with the full list of names.)

## COMPLAINT AND REQUEST FOR INJUNCTION

## I. The Parties to This Complaint

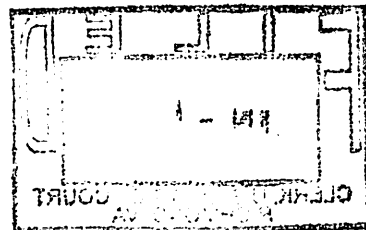
## A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	Marsielle Bey ex. Rel Corey M Lewis
Street Address	C/o 13090 Gravelbrook Road
City and County	South Prince George Territory
State and Zip Code	Virginia Republic [23805]
Telephone Number	
E-mail Address	

## B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.



10/1/2021 10:13

## Defendant No. 1

Name	ESTHER WIGGINS LYLE
Job or Title <i>(if known)</i>	DBA Presiding Judge 17th Judicial District of Virginia (Substitute)
Street Address	7000 Lucy Corr Boulevard
City and County	Chesterfield Territory
State and Zip Code	Virginia Republic [23832]
Telephone Number	
E-mail Address <i>(if known)</i>	

## Defendant No. 2

Name	VANESSA L JONES
Job or Title <i>(if known)</i>	DBA Chief Judge 12th Judicial District of Virginia
Street Address	7000 Lucy Corr Boulevard
City and County	Chesterfield Territory
State and Zip Code	Virginia Republic [23832]
Telephone Number	
E-mail Address <i>(if known)</i>	

## Defendant No. 3

Name	CARL S LEONARD
Job or Title <i>(if known)</i>	DBA Sheriff Chesterfield County
Street Address	9500 Courthouse Road
City and County	Chesterfield Territory
State and Zip Code	Virginia Republic [23832]
Telephone Number	
E-mail Address <i>(if known)</i>	

## Defendant No. 4

Name	
Job or Title <i>(if known)</i>	
Street Address	
City and County	
State and Zip Code	
Telephone Number	
E-mail Address <i>(if known)</i>	

**II. Basis for Jurisdiction**

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? *(check all that apply)*



Federal question



Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

**A. If the Basis for Jurisdiction Is a Federal Question**

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

Count I - Bill of Rights Amendment V (Due Process)

Count II - Bill of Rights Amendment IX (Rights to Privacy and Liberty)

**B. If the Basis for Jurisdiction Is Diversity of Citizenship****1. The Plaintiff(s)****a. If the plaintiff is an individual**

The plaintiff, *(name)* Marsielle Bey ex Rel. Corey M Lewis, is a citizen of the State of *(name)* Virginia Republic.

**b. If the plaintiff is a corporation**

The plaintiff, *(name)*, is incorporated under the laws of the State of *(name)*, and has its principal place of business in the State of *(name)*.

*(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)*

**2. The Defendant(s)****a. If the defendant is an individual**

The defendant, *(name)*, is a citizen of the State of *(name)*. Or is a citizen of *(foreign nation)*.

## b. If the defendant is a corporation

The defendant, (name) ESTHER WIGGINS LYLE dba Judge, is incorporated under the laws of the State of (name) Virginia, and has its principal place of business in the State of (name) Virginia.  
 Or is incorporated under the laws of (foreign nation) \_\_\_\_\_, and has its principal place of business in (name) \_\_\_\_\_.

*(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)*

## 3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because (explain):

Denied Provision in the Constitution - \$250,000.00 per violation  
 Conspiracy - \$10,000.00  
 Fraud - \$10,000.00

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**III. Statement of Claim**

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the injunction or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

## A. Where did the events giving rise to your claim(s) occur?

The event given rise to this claim occurred in Chesterfield County Juvenile and Domestic Relation Court, 7000 Lucy Corr Boulevard, Chesterfield Territory, Virginia Republic [23832]

## B. What date and approximate time did the events giving rise to your claim(s) occur?

The events occurred on May 28, 2021 @ 11:00 A.M.

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C. What are the facts underlying your claim(s)? *(For example: What happened to you? Who did what? Was anyone else involved? Who else saw what happened?)*

1. In March 2021, a civil action under 42 U.S.C. 1983 was filed in the United States District Court for the Eastern District of Virginia (Civil No. 3:21cv172) against PHILLIP T DISTANISLAO JR., et. al., while presiding as (Judge) of the Petersburg Juvenile and Domestic Relations Court for alleged violations of Constitutionally protected rights involving a common, commercial (and civil debt).

2. On May 28, 2021, in the Chesterfield County Juvenile and Domestic Relations Court, Case No. JA072347-02-01) Substitute Presiding Judge, ESTHER WIGGINS LYLE (17th Judicial District of Virginia) entered an finding of contempt in the civil matter, and ordering a six (6) month sentence or payment of \$1500.00, in a matter currently pending in the United States District Court for the Eastern District of Virginia. ESTHER WIGGINS LYLE, while acting as Substitute Presing Judge, ordered that I committed myself to the Chesterfield County Sheriff Department, Chesterfield County Virginia on May 2, 2021 or a capias will be issued in the matter involving a common, commercial (and civil debt).

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#### IV. Irreparable Injury

Explain why monetary damages at a later time would not adequately compensate you for the injuries you sustained, are sustaining, or will sustain as a result of the events described above, or why such compensation could not be measured.

The alleged acts of the Defendant produce a real and immediate threat of future injury in that, the Complainant rights to protection under federal statue, the Constitution for the United States of America 1787 / 1791, Bill of Rights Amendments IV (including Warrant Clause), Amendment V (Due Process and Equal Protection), and Ninth Amendment (Rights to Privacy and Liberty), Treaty of Peace and Freindship 1787 / 1836, and Title 22, Ch. 2, Sec 141 of a General and Permanent Character (AA222141).

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#### V. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

Preliminary Injunctive Relief - (1) Order the finding in Chesterfield Juvenile and Domestic Relations Court, (Case No. JA072347-02-01) by Substitute Judge ESTHER WIGGINS LYLE be set aside/vacated while pending litigation is ongoing in the United States District Court for the Eastern District of Virginia (Civil No. 3:21cv172). (2) Order Chesterfield County Juvenile and Domestic Relation Court (Clerk and Judges) to refrain from violating Complainant's Constitutionally protected rights (Amendment IV) from issuing body attachments without probable cause. (3) Order Chesterfield County Sheriff, Carl S Leonard and Chesterfield County Police Chief, JEFFREY L KATZ to refrain from arresting the Complainant without probable cause and/or conspiring against constitunally protected rights of the Complainant under the Constitution for the United States.

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**VI. Certification and Closing**

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

**A. For Parties Without an Attorney**

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing:

6/1/2021

Signature of Plaintiff

Marsielle Bey (Corey M Lewis)

Printed Name of Plaintiff

Marsielle Bey ex. Rel Corey M Lewis (All Rights Reserved)

**B. For Attorneys**

Date of signing:

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Street Address

State and Zip Code

Telephone Number

E-mail Address

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF VIRGINIA  
RICHMOND DIVISION

Massielle Day ex. Rel Covey M. Lewis  
Plaintiff(s),

v.

Civil Action Number: \_\_\_\_\_

ESTHER WIGGINS LYLE et. al.  
Defendant(s).

LOCAL RULE 83.1(M) CERTIFICATION

I declare under penalty of perjury that:

No attorney has prepared, or assisted in the preparation of Complaint and Jurisdiction.  
(Title of Document)

Massielle Day, In propria persona  
Name of Pro Se Party (Print or Type)

Massielle Day (see Rights Waived)  
Signature of Pro Se Party

Executed on: 6/1/2021 (Date)

OR

The following attorney(s) prepared or assisted me in preparation of \_\_\_\_\_.  
(Title of Document)

\_\_\_\_\_  
(Name of Attorney)

\_\_\_\_\_  
(Address of Attorney)

\_\_\_\_\_  
(Telephone Number of Attorney)

Prepared, or assisted in the preparation of, this document

\_\_\_\_\_  
(Name of Pro Se Party (Print or Type)

\_\_\_\_\_  
Signature of Pro Se Party

Executed on: \_\_\_\_\_ (Date)